

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BABY DOE, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	Case No. 3:22-cv-00049-NKM
	)	
JOSHUA MAST, <i>et al.</i> ,	)	
	)	
<i>Defendants.</i>	)	
_____	)	

**MOTLEY’S CONSENT MOTION TO  
EXTEND TIME TO ANSWER AMENDED COMPLAINT**

Under Federal Rule of Civil Procedure 6(b)(1)(A), Defendant Kimberley Motley respectfully moves this Court for an Order extending Ms. Motley’s time to answer Plaintiffs’ Amended Complaint by two weeks, to and including August 21, 2024. In support of this motion, Ms. Motley states the following:

1. On July 24, 2024, the Court denied Ms. Motley’s motion to dismiss for lack of personal jurisdiction and for failure to state a claim, making her deadline for answering the Amended Complaint August 7, 2024. *See* Dkt. No. 455.

2. Federal Rule of Civil Procedure 6(b)(1)(A) allows a court to extend deadlines, including the time within which to respond to a complaint, upon a showing of “good cause.” Ms. Motley respectfully submits that good cause exists for granting the requested two-week extension to answer the Amended Complaint.

3. Given the length of the Amended Complaint, the complexity of the factual allegations and legal issues presented, and Ms. Motley's potential counterclaims against Plaintiffs, Ms. Motley seeks a modest extension of two weeks to file her responsive pleading.

4. Ms. Motley is not making this motion for any improper purpose or for delay. She is filing this motion before the original deadline, as required by Rule 6(b)(1)(A). Additionally, there is no potential for prejudice to Plaintiffs if the Court grants this short extension.

5. Ms. Motley's counsel has conferred with Plaintiffs' counsel, and Plaintiffs consent to the requested two-week extension to answer.

For the reasons set forth above, good cause exists to grant Ms. Motley's motion. Ms. Motley, therefore, respectfully requests that the Court grant the motion and extend the deadline for her to answer the Amended Complaint by two weeks, to and including August 21, 2024. A proposed order is attached hereto as **Exhibit A** for the Court's convenience.

Dated: August 6, 2024.

Respectfully submitted,

/s/ Thomas W. Davison

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**CERTIFICATE OF SERVICE**

I certify that on August 6, 2024, I caused the foregoing to be electronically filed with the Court's CM/ECF system, which will provide service to all counsel of record.

/s/ Thomas W. Davison

Thomas W. Davison

# EXHIBIT A

